

FORM ACF-202 – TANF CASELOAD REDUCTION REPORT

State: Montana

Fiscal Year to which credit applies: 2009

Overall Report X
Two-parent Report (check one)

Apply the overall credit to the two-parent participation rate? yes
X no

PART 1 –Eligibility Changes Made Since FY 2005

(Complete this section for EACH change)

1. Name of eligibility change: Work-Eligible Individuals Required to have FIA/EP
2. Implementation date of eligibility change: October 1, 2006
3. Description of policy, including the change from prior policy:

Prior to the TANF Reauthorization Regulations contained in the Deficit Reduction Act of 2005 (DRA), the only individuals who were required to participate in allowable work activities were individuals receiving TANF or individuals who were sanctioned from the receipt of TANF. Failure of these individuals to negotiate an employability plan, outlining the allowable work activities, resulted in case closure and/or denial. Individuals who were non-participating for other reasons, e.g., disqualification due to an intentional program violation, were not considered to be “receiving TANF” and therefore were not required to participate in allowable work activities.

With the changes in the TANF Reauthorization Regulations contained in the DRS, all “work-eligible” individuals are required to participate in allowable work activities as defined in the DRA. Work-eligible individuals are defined as anyone receiving TANF benefits and/or a disqualified parent of a minor child receiving TANF benefits.

Based on these regulations, changes were made in the eligibility system to identify disqualified parents of a minor child receiving TANF benefits as a work-eligible individual and require them to negotiate an employability plan outlining the allowable work activities they would agree to participate in. Failure of these work-eligible individuals to negotiate an employability plan would result in case closure and/or denial.

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4. Description of the methodology used to calculate the estimated impact of this eligibility change (attach supporting materials to this form):

Failure of a work-eligible individual to negotiate an employability plan outlining the allowable work activities the individual agreed to participate in resulted in case closure and/or denial. Montana's eligibility system requires a reason code for every case closure or denial. The reason code of 'FIA' (Family Investment Agreement/Employability Plan) is used when individual fail to negotiate an employability plan outlining the allowable work activities when they are identified as a work-eligible individual.

Data reported by the eligibility system on the TS 103B34.1 TANF Closed Cases report contains the number of TANF cases that were closed in a given month by specific denial/closure reasons. The report contains a monthly number of TANF cases that were closed in a given month using the 'FIA' code. This report was used to calculate the impact of this eligibility change on the caseload. (See attached copies of the report for October 2007—September 2008.)

In the absence of this policy change, cases closing for this reason may have remained in the caseload for the remainder of FFY 2008. We have applied a decay factor to the number of cases closed for this reason throughout FFY 2008.

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: -85

Please refer to the attached impact table.

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1. Name of eligibility change: Blackfeet Tribal TANF Plan changes
2. Implementation date of eligibility change: January 1, 2007
3. Description of policy, including the change from prior policy: The Blackfeet Tribal TANF Plan changed to only allow households that are comprised of 100% enrolled Blackfeet Tribal members to receive Tribal TANF benefits. The remaining households, who may have previously received Blackfeet Tribal TANF, were referred back to the State TANF program.

This change would have resulted in an increase in the State TANF caseload, rather than a caseload reduction.

4. Description of the methodology used to calculate the estimated impact of this eligibility change: (attach supporting materials to this form) NA

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: NA

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1. Name of eligibility change: Incarcerated individuals are no longer eligible for TANF benefits.
2. Implementation date of eligibility change: January 17, 2007
3. Description of policy, including the change from prior policy: Previously, individuals who were required to participate in allowable work activities were allowed to apply unsupervised work activities performed while incarcerated to their participation hours.

Due to the restrictions in the Deficit Reduction Act of 2005 (DRA) as to what constitutes an allowable work activity and the requirement for daily supervision, individuals who are incarcerated and unable to complete the required number of hours in allowable work activities are no longer eligible for TANF. These individuals would be closed using the 'FIA' (Family Investment Agreement/Employability Plan) closure code.

4. Description of the methodology used to calculate the estimated impact of this eligibility change: (attach supporting materials to this form)

Individuals who are incarcerated and unable to complete the required number of participation hours in allowable work activities would have been closed off TANF. Montana's eligibility system requires a reason code for every case closure or denial. The reason code of 'FIA' (Family Investment Agreement/Employability Plan) is used when individual is unable to complete the required number of participation hours in allowable work activities due to incarceration.

Data reported by the eligibility system on the TS 103B34.1 TANF Closed Cases report contains the number of TANF cases that were closed in a given month by specific denial/closure reasons. The report contains a monthly number of TANF cases that were closed in a given month using the 'FIA' code. This report was used to calculate the impact of this eligibility change on the caseload. (See attached copies of the report for October 2007—September 2008.)

In the absence of this policy change, cases closing for this reason may have remained in the caseload for the remainder of FFY 2008. We have applied a decay factor to the number of cases closed for this reason throughout FFY 2007.

****Because of the use of the same closure/denial code, 'FIA', the impact of this change cannot be separated from the impact of the "Work-eligible" changes outlined on page 1. These changes will be "bundled" in this report.**

3. Estimated average monthly impact of this eligibility change on caseload in comparison year: See above.

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1. Name of eligibility change: Pro-rating of TANF benefits based on date of application and/or date of negotiation of Family Investment Agreement/Employability Plan (FIA/EP).
2. Implementation date of eligibility change: July 1, 2007
3. Description of policy, including the change from prior policy: Changes were made to pro-rate the initial month of TANF benefits based on the date of application, provided the individuals were receiving child-only TANF; referred to Tribal NEW for case management services; or referred to the WoRC program for case management services and negotiated their FIA/EP within three working days of referral or had good cause for failing to negotiate within three working days.

Individuals who did not meet the above criteria would have their initial month of TANF benefits pro-rated to the date they negotiated their FIA/EP and agreed to participate in allowable work activities. This would have resulted in a smaller grant amount, but not specifically case closure or denial. This policy change would not have resulted in a caseload reduction.

4. Description of the methodology used to calculate the estimated impact of this eligibility change: (attach supporting materials to this form) NA

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: NA

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State: Montana

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1. Name of eligibility change: Application processing timeframes changed to 30 days from 45 days
2. Implementation date of eligibility change: July 1, 2007
3. Description of policy, including the change from prior policy: Previously, eligibility workers in the Office of Public Assistance were allowed 45 days to complete the eligibility determination on a TANF application.

Changes were made to decrease the TANF application processing timeframe to 30 days from the previous 45 day time period. This change was made to bring policy in alignment with current Food Stamp program policy and also ensure that individuals who are applying for TANF benefits are determined eligible sooner, allowing for more prompt involvement in allowable work activities.

This change would not have resulted in a caseload increase or decrease.

4. Description of the methodology used to calculate the estimated impact of this eligibility change: (attach supporting materials to this form) NA

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: NA

FORM ACF-202 – TANF CASELOAD REDUCTION REPORT

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1. Name of eligibility change: TANF Payment Standard increased
2. Implementation date of eligibility change: July 1, 2007
3. Description of policy, including the change from prior policy: Previously the TANF Payment Standard was set at 33% of the 2005 Federal Poverty Level. Effective July 1, 2007, the TANF Payment Standard was increased to 33% of the 2007 Federal Poverty Level from 33% of the 2005 Federal Poverty Level. This change resulted in an increase in TANF benefits to participants.

This change would have resulted in higher TANF benefits to the client, it would not result in caseload reductions.

4. Description of the methodology used to calculate the estimated impact of this eligibility change: (attach supporting materials to this form) NA

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: NA

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1. Name of eligibility change: Increased recovery percentage on continued benefits
2. Implementation date of eligibility change: July 1, 2007
3. Description of policy, including the change from prior policy: Currently, when an individual is involved in a fair hearing regarding an adverse action, they can request and be found eligible for continued benefits. If the fair hearing is found in the state's favor, the individual is required to repay those continued benefits. If the individual continues to receive TANF cash assistance, the TANF benefits are reduced at a rate of 10% of the TANF grant amount, or \$10.00, whichever is higher.

Policy changed to allow continued benefits that were requested due to a sanction for non-compliance in allowable work activities to be repaid at a rate of 25% or \$25, whichever is higher. This change will not result in case closure, simply a reduction in the amount of TANF benefits available to the individual. This policy change did not impact the caseload reduction.
4. Description of the methodology used to calculate the estimated impact of this eligibility change: (attach supporting materials to this form) NA

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: NA

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State: Montana

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1. Name of eligibility change: Case Transfer Changes
2. Implementation date of eligibility change: August 1, 2007
3. Description of policy, including the change from prior policy: Previously, when a case was transferred to another county within the State, the household was allowed flexibility in participation hours to complete the move to another county.

With the stricter requirements as to what constitutes an allowable work activity under the Deficit Reduction Act (DRA), policy was changed to indicate that individuals whose case was transferred to another county were required to contact the ‘receiving’ county and negotiate an updated employability plan sooner. Failure to do so would result in case closure.

4. Description of the methodology used to calculate the estimated impact of this eligibility change:
(attach supporting materials to this form)

Failure of a TANF household to negotiate an employability plan with the ‘receiving’ county in a timely fashion results in case closure and/or denial. Montana’s eligibility system requires a reason code for every case closure or denial. The reason code of ‘FIA’ (Family Investment Agreement/Employability Plan) is used when individual fail to negotiate an employability plan with the ‘receiving’ county in a timely fashion following case transfer.

Data reported by the eligibility system on the TS 103B34.1 TANF Closed Cases report contains the number of TANF cases that were closed in a given month by specific denial/closure reasons. The report contains a monthly number of TANF cases that were closed in a given month using the ‘FIA’ code. This report was used to calculate the impact of this eligibility change on the caseload. (See attached copies of the report for October 2007—September 2008.)

In the absence of this policy change, cases closing for this reason may have remained in the caseload for the remainder of FFY 2008. We have applied a decay factor to the number of cases closed for this reason throughout FFY 2007.

****Because of the use of the same closure/denial code, ‘FIA’, the impact of this change cannot be separated from the impact of the “Work-eligible” changes outlined on page 1 or the “Incarceration” changes on page 4. These changes will be “bundled” in this report.**

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: See above

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State: Montana

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1. Name of eligibility change: Conciliation Process
2. Implementation date of eligibility change: October 1, 2006
3. Description of policy, including the change from prior policy: Previously when an individual who was required to participate in allowable work activities was out of compliance with those activities, the WoRC Case Manager entered into a formal 90-day conciliation process with the individual. This process allowed the individual an opportunity to come back into compliance and avoid sanction. However, often the individual was not fully in compliance during this 90-day time period.

With the changes to the allowable work activities as well as the stricter participation requirements outlined in the DRA, this policy was changed to stop the formal 90-day conciliation process and instead to adopt an informal conciliation process consisting of one phone call and/or note to inquire as to the reasons for non-compliance. Failure to contact the individual and/or have them respond within three (3) days would result in sanction recommendation.

This change to the conciliation process may have resulted in sanctions being imposed sooner on an individual, resulting in a higher number of sanctions, which may result in case closure.

4. Description of the methodology used to calculate the estimated impact of this eligibility change:
(attach supporting materials to this form)

Imposition of a second or subsequent sanction results in case closure. Montana's eligibility system requires a reason code for every case closure or denial. The reason code of 'SAN' (Sanction) is used when an individual's TANF case is closing due to sanction.

Data reported by the eligibility system on the TS 103B34.1 TANF Closed Cases report contains the number of TANF cases that were closed in a given month by specific denial/closure reasons. The report contains a monthly number of TANF cases that were closed in a given month using the 'SAN' code. This report was used to calculate the impact of this eligibility change on the caseload. (See attached copies of the report for October 2007—September 2008.)

In the absence of this policy change, cases closing for this reason may have remained in the caseload for the remainder of FFY 2008. We have applied a decay factor to the number of cases closed for this reason throughout FFY 2008.

Please refer to the attached impact table.

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: -366

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1. Name of eligibility change: Sanction Policy changes

2. Implementation date of eligibility change: January 1, 2008

3. Description of policy, including the change from prior policy: Previously when a work-eligible individual was out of compliance with negotiated work activities, a sanction was imposed on the individual. Sanction periods a “penalty” month for the 1st sanction which resulted in the individual’s share of the TANF cash assistance grant being removed. 2nd and subsequent sanctions resulted in a one-month ineligibility period or case closure.

With the stricter requirements as to what constitutes an allowable work activity under the Deficit Reduction Act (DRA), policy was changed to implement stricter sanction policies. Effective January 1, 2008, the 1st sanction resulted in the same penalty month; the 2nd sanction resulted in the same one-month ineligibility period; the 3rd sanction resulted in a three-month ineligibility period and the 4th and subsequent sanction resulted in a six-month ineligibility period.

4. Description of the methodology used to calculate the estimated impact of this eligibility change: (attach supporting materials to this form)

Imposition of a second or subsequent sanction results in case closure. Montana’s eligibility system requires a reason code for every case closure or denial. The reason code of ‘SAN’ (Sanction) is used when an individual’s TANF case is closing due to sanction.

Data reported by the eligibility system on the TS 103B34.1 TANF Closed Cases report contains the number of TANF cases that were closed in a given month by specific denial/closure reasons. The report contains a monthly number of TANF cases that were closed in a given month using the ‘SAN’ code. This report was used to calculate the impact of this eligibility change on the caseload. (See attached copies of the report for October 2007—September 2008.)

In the absence of this policy change, cases closing for this reason may have remained in the caseload for the remainder of FFY 2008. We have applied a decay factor to the number of cases closed for this reason throughout FFY 2008.

**Because of the use of the same closure/denial code, ‘SAN’, the impact of this change cannot be separated from the impact of the “Conciliation Process” changes outlined on page 10. These changes will be “bundled” in this report.

Please refer to the attached impact table.

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: See above

FORM ACF-202 – TANF CASELOAD REDUCTION REPORT

State: Montana

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1. Name of eligibility change: Work Support Payment eligibility
2. Implementation date of eligibility change: January 1, 2008
3. Description of policy, including the change from prior policy:

Prior to the TANF Reauthorization Regulations contained in the Deficit Reduction Act of 2005 (DRA), individuals who were receiving TANF but were losing eligibility due to increased or new employment were issued a work support payment in the amount of \$375. With the changes in the TANF Reauthorization Regulations contained in the DRS regarding the documentation and verification of participation hours, policy was changed to require the individual who was losing eligibility for TANF to provide all verification and documentation of participation in allowable work activities prior to being determined eligible for the work support payment.

This change would not have resulted in a caseload increase or decrease.

4. Description of the methodology used to calculate the estimated impact of this eligibility change (attach supporting materials to this form): NA

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: NA

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1. Name of eligibility change: Adding newborn the month of birth
2. Implementation date of eligibility change: January 1, 2008
3. Description of policy, including the change from prior policy: Previously, newborn children were added to the TANF household the month following the month of birth. In order to allow more individuals to be disregarded from the work participation rate due to being a single custodial parent with a child under the age of one, policy was changed to include the newborn child the month of birth, rather than the month following.

This change would not have resulted in a caseload increase or decrease.

4. Description of the methodology used to calculate the estimated impact of this eligibility change: (attach supporting materials to this form) NA

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: NA

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1. Name of eligibility change: Participation Hours (requirements)

2. Implementation date of eligibility change: January 1, 2008

3. Description of policy, including the change from prior policy:

Montana has always required “universal” participation of all work-eligible individuals regardless of their status as a single parent or a two-parent household. Montana has also always required a higher number of hours of participation than what is required in federal regulation, in an attempt to obtain the minimal number of hours required to meet the participation rate.

Effective January 1, 2008 the required participation hours were changed, in an attempt to accommodate the needs of the household based on the stricter definition of allowable work activities in the Deficit Reduction Act (DRA). Single parent households with a child under the age of six are required to complete 27 hours of participation per week in allowable work activities; single parent households without a child under the age of six and each parent in a two-parent household are required to complete 33 hours of participation per week in allowable work activities.

Failure to complete the required number of allowable work activities, without good cause will result in sanction. However, because the participation requirements were lesser than previous required hours of participation, this change would not have resulted in a higher number of case closures.

4. Description of the methodology used to calculate the estimated impact of this eligibility change:
(attach supporting materials to this form) NA

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: NA

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1. Name of eligibility change: Post-Employment Program

2. Implementation date of eligibility change: August 1, 2008

3. Description of policy, including the change from prior policy: Changes were made to retain individuals who gained employment and who would otherwise have lost eligibility for TANF cash assistance, on the TANF caseload for a period not to extend three months.

By increasing the earned income disregards of these individuals, the state is able to retain them on the TANF caseload for work participation reasons and also offer job retention services, including ongoing TANF cash assistance, child care and supportive services for the three month period. These changes were made in an effort to stabilize families who are attempting to become self-sufficient through employment.

At the time the Post-Employment Program was implemented, the work support payments were discontinued.

This change would have resulted in more cases remaining on TANF, not a caseload decrease.

4. Description of the methodology used to calculate the estimated impact of this eligibility change: (attach supporting materials to this form) NA

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: NA

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State: Montana

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1. Name of eligibility change: Good cause for non-cooperation with CSED criteria expanded
2. Implementation date of eligibility change: July 1, 2008
3. Description of policy, including the change from prior policy: Individuals who are receiving TANF cash assistance are required to cooperate in the pursuit of child support enforcement and benefits. Montana has always provided good cause reasons for not pursuing child support.

In July of 2008 Montana expanded the good cause reasons for not pursuing child support to include the absent parent being listed on the Montana Sexual and Violent Offender Registry.

This change would not have resulted in a caseload decrease.

4. Description of the methodology used to calculate the estimated impact of this eligibility change: (attach supporting materials to this form) NA

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: NA

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State: Montana

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1. Name of eligibility change: Supportive Services allowed for all work-eligible individuals
2. Implementation date of eligibility change: August 1, 2008
3. Description of policy, including the change from prior policy: Prior to the TANF Reauthorization Regulations contained in the Deficit Reduction Act of 2005 (DRA), the only individuals who were required to participate in allowable work activities were individuals receiving TANF or individuals who were sanctioned from the receipt of TANF. These individuals were provided supportive service funds to assist with participation requirements.

With the changes in the TANF Reauthorization Regulations contained in the DRS, all “work-eligible” individuals are required to participate in allowable work activities as defined in the DRA. Work-eligible individuals are defined as anyone receiving TANF benefits and/or a disqualified parent of a minor child receiving TANF benefits. Based on these regulations, changes were made in the eligibility system to allow supportive service funds to all work-eligible individuals.

This change would not have resulted in a caseload decrease.

4. Description of the methodology used to calculate the estimated impact of this eligibility change: (attach supporting materials to this form) NA

5. Estimated average monthly impact of this eligibility change on caseload in comparison year: NA

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State: _____Montana_____

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PART 2 – Estimate of Caseload Reduction Credit

(Complete Part 2 using Excel Workbook provided.)

See attached Part 2 worksheet and Impact Templates.

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PART 3 -- Certification

I certify that we have provided the public an appropriate opportunity to comment on the estimates and methodology used to complete this report and considered those comments in completing it. Further, I certify that this report incorporates all reductions in the caseload resulting from State eligibility changes and changes in Federal requirements since Fiscal Year 2005.

(signature)

(name)

(title)